

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
COURT FILE NO. 0:12-CV-01156-DWF-LIB**

Darin Anderson,

Plaintiff,

v.

Northern Collections, Inc.,

Defendant.

**NOTICE OF INTENT TO CLAIM
ATTORNEY'S FEES AND COSTS**

PLEASE TAKE NOTICE that Plaintiff and Plaintiff's undersigned counsel hereby give Notice of Intent to Claim an Award of Attorney's Fees and Costs. Such claim for an award of fees and Costs shall be based upon the statutory authority of 15 U.S.C. § 1692k(a) and 28 U.S.C. §§ 1920 and 1924, as well as the authority of the Federal Rules of Civil Procedure. The counsel who rendered the legal services upon which the claim is based is as follows:

1. Peter F. Barry, Esq.
2. All other Plaintiff's counsel who participated in or made an appearance in this case, if any.
3. Attorneys, law clerks, paralegals, and administrative staff of the above, if any.

Plaintiff proposes that the Court issue a scheduling Order for the presentation of motions for attorney's fees that allows the parties a minimum of 30 days from

the date of this Notice to attempt to informally settle this issue of attorney's fees and costs, without the necessity of the Court's involvement.

ALSO PLEASE TAKE NOTICE that Plaintiff has been advised through counsel that the defaulting Defendant herein is insolvent. Plaintiff has therefore now made a claim on the holder of an insurance bond with the Travelers Insurance Company, naming Defendant as an insured, and is awaiting a response from the claims adjuster that it has assigned to this claim. Plaintiff's counsel has been in regular contact with that adjuster since early December 2012, and as recently as January 22, 2013, and is attempting to resolve the issue of attorney's fees and costs without the necessity of a motion before the Honorable Court.

Dated: January 24, 2013

Respectfully submitted,

BARRY, SLADE & WHEATON, LLC

By: **s/Peter F. Barry**
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